

**CROSSLEY CONSULTING**  
**Organic Certification Advisors**

P.O. Box 729  
Montrose, CA 91029-0729  
Phone: (818) 248-8323 Fax: (818) 541-0976  
e-mail: rcrossley@worldnet.att.net

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August 5, 2005

Mr. Arthur Neal  
Director, Program Administration  
National Organic Program, USDA-AMS-TMP-NOP  
1400 Independence Ave., SW  
Room 4008-SO AG Stop 0268  
Washington DC 20250

Dear Arthur,

The Federal Register of June 17, 2005 contains a notice asking for comments on the National Organic Program, Sunset Review of the National List. These comments reflect my view of the materials found in section 205.605 & 606 that should be included in the Sunset Review.

1. Prior to beginning the process to establish the present National List of approved materials the NOSB Corp, Livestock and Processing Sub Committees spent over two years having meetings around the country talking with the organic industry about their need and the materials being used. When the processing sub committee published its first list of materials there were over 120 entrees of ingredients/processing aids being used in the industry. This list was then reviewed against the definitions for synthetics found in the OFPA. Based on this evaluation the committee informed the Tap coordinator about those materials that would need to have a TAP review. Over the next five years the board approved the processing materials found in section 205.605 and 606. When we voted to approve a material for organic production we knew someone in the industry was using it.
2. Members of the present NOSB are saying that if there are no comments on a material then it is not being used in organic production so there is no need for the NOSB to conduct a review. Several of our clients would like to comment on the materials they use in producing their product. The fact that all comments are to be posted on the NOP web sight has caused them not to comment because the National List processing aids used to produces their organic product are confidential information.
3. Crossley Consulting has provided organic processing consulting to companies in all phases of food processing over the past nine years. These companies produce organic products ranging from crackers, baked goods, cereals, dairy, frozen, pizzas, enzymes, sauces/dressings, oils, soy products, liquid/ powdered products, jams/jellies, snack food, drinks, confectionary, meat and chicken products to pet food. In my reviews of their product profiles have noted the use of most, if not all, of the materials listed in section 205.605 and 205.606.
4. It took years of public comments and reviews for the NOSB to compile the present National List section 205.605&606. For the present NOSB not to give all of these materials a sunset TAP review would be a disservice to the efforts and time spent by former boards members to establish the present processing materials list.

Sincerely,

Rod

E. Rod. Crossley